

September 8, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Promoting Innovation and Competition in the Provision of Multichannel Video
Programming Distribution Services (DN 14-261)

Dear Ms. Dortch:

I am writing on behalf of Montgomery Community Media, the public access media organization serving the more than one million residents of Montgomery County Maryland with innovative multiplatform news and information programming, on-air and online.

We are concerned about the impact the proposed rulemaking (DN 14-261) will have on our organization and our ability to provide Public, Educational and Government (PEG) Access services to our community. We strongly support the comments and reply comments of the City of San Antonio and of Anne Arundel County *et al.* in this proceeding.

We are particularly concerned about the rulemaking's proposal to classify over-the-top (OTT) video services provided by cable franchise holders as something other than a "cable service." Such a designation would allow cable franchise holders to undercut their public interest obligations.

The loss of PEG fees to Montgomery Community Media would be devastating. We work with scores of nonprofits and local government agencies that leverage our platforms for communicating their messages to the community. Still further, the local newspaper went out of business this year, creating a huge gap for this DC suburb in vital local news and information. MCM is now the only county-wide organization supplying hyperlocal content to diverse communities as commercial media entities continue to cut back. If PEG fees were to be lost, MCM would be forced to shut down... leaving Montgomery County residents in a true 'news desert'. PEG fees must be sustained to ensure that our electorate is provided the news and information they need to remain informed and engaged with their community and elected officials.

We ask the Commission not to diminish these vital PEG public interest requirements as it considers this proposed rulemaking.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Merlyn Reineke', with a stylized flourish at the end.

Merlyn Reineke
Chief Executive Officer
Montgomery Community Media, Rockville MD

Cc: Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly